



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

May 8, 1998

Mr. L. Joseph Callan  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Mr. Callan:

**SUBJECT: PROPOSED FINAL AMENDMENT TO 10 CFR PART 55, "INITIAL LICENSED OPERATOR EXAMINATION REQUIREMENTS"**

During the 452nd meeting of the Advisory Committee on Reactor Safeguards, April 30 - May 2, 1998, we met with representatives of the NRC staff and the Nuclear Energy Institute to discuss the proposed final amendment to 10 CFR Part 55 regarding initial licensed operator examination requirements. We also had the benefit of the document referenced.

**RECOMMENDATIONS:**

1. We recommend that the amendment to 10 CFR Part 55, "Initial Licensed Operator Examination Requirements," be issued for use by the industry.
2. We recommend that the staff analyze results of the 68 pilot examinations to ensure that the quality and level of difficulty of the examinations are consistent across the regions.

**DISCUSSION:**

Transfer of the responsibility for preparing and administering initial licensed operator examinations to licensees may reduce confidence that operators will place safe plant operations above other imperatives imposed by plant management. There is a concern that there could be potential shifts in the obligations felt by those taking the examination. To guard against this, performance measures on the effectiveness of the examination process should be developed and assessed periodically.

We believe that the benefits of the new process far outweigh the potential drawbacks. This process will provide more assurance that plant-specific aspects of the examinations are accurate and up to date. Indeed, the NRC staff will retain its authority to perform appropriate checks on operator qualifications and will continue to directly observe and evaluate the performance of every license applicant on the operating tests (simulator and job performance measures). The NRC staff obligations to ensure adequacy and accuracy of examinations prepared by licensees will remain the same.

Results of the NRC staff's review of the pilot program showed that the quality of the examinations varied widely and that many examinations needed significant revision. Therefore,

the NRC staff concluded that the quality and level of difficulty of the examinations require continued attention. Our understanding is that this review was not done across the regions to ensure consistency in the quality and level of difficulty.

The new examination process makes the overall operator licensing program more consistent with the Agency's other oversight programs. It holds the licensee accountable for the quality of the examinations. The NRC examiners may now focus more on the cognitive level of the questions and the plausibility of the distractors (wrong-answer choices).

We believe that the results achieved and the experience gained from the pilot program have shown that the proposed amendment to 10 CFR Part 55 can result in an effective examination process.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Seale".

R. L. Seale  
Chairman

Reference:

Memorandum dated April 20, 1998, from Jack W. Roe, Office of Nuclear Reactor Regulation, to John T. Larkins, Advisory Committee on Reactor Safeguards, Subject: Transmittal of Advanced Copy of the Final Rule on Requirements for Initial Operator Licensing Examinations (10 CFR Part 55)(Predecisional Draft)